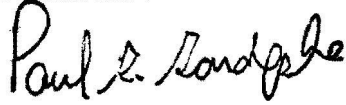


Memo Endorsed: Defendant's time to respond to the Complaint is extended to June 6, 2022. Plaintiff's request to adjourn the June 9, 2022 conference is denied.

Dated: May 17, 2022

SO ORDERED.



Paul G. Gardephe
United States District Judge



THE CITY OF NEW YORK
LAW DEPARTMENT

100 CHURCH STREET
NEW YORK, NY 10007

PETER L GERMANAKOS
Special Assistant Corporation Counsel
(212) 356-2456

May 12, 2022

VIA ECF

Hon. Paul G. Gardephe
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *D.R. v N.Y.C. Dep't of Educ.* 22-cv-1881 (PGG)(GWG)

Dear Judge Gardephe:

I am a Special Assistant Corporation Counsel in the office of Corporation Counsel, Hon. Sylvia O. Hinds-Radix, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, et seq. ("IDEA"), and this action.

I write to respectfully request a 30-day extension of Defendant's time to respond to the complaint, from May 14 to June 13, 2022. This is the second such request, the first was granted by Your Honor on March 24 (ECF 9). Plaintiff does not consent to this request; we requested Plaintiff's basis for withholding consent but it was not provided. Further, we request an adjournment of the Court conference set for June 9, *sine die*. Plaintiff consents to the adjournment request.

The requested extension will hopefully allow the parties, who have exchanged settlement proposals, to successfully resolve this matter. As with most of the many dozens of similar IDEA fees-only cases which have settled without any motion practice nor the need to file a response to the complaint, we are hopeful that the parties will settle this matter without the need for Court intervention.

Accordingly, Defendant respectfully requests a 30-day extension of its time to respond to the complaint to June 13, 2022 and an adjournment of the Court conference *sine die*.

Thank you for considering these requests.

Respectfully submitted,

/s/

Peter L. Germanakos
Special Assistant Corporation Counsel

cc: Steven Alizio, Esq. (via ECF)